

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

\_\_\_\_\_  
This Document Relates to:  
  
ALL CASES  
\_\_\_\_\_

Case No. 23-md-03084-CRB

**AFFIDAVIT OF TIFFANY R. ELLIS IN  
SUPPORT OF PLAINTIFFS' LIST OF  
DISPUTED ENTRIES FOR SPECIAL  
MASTER REVIEW**

Judge: Honorable Barbara S. Jones

1 I, Tiffany R. Ellis, hereby declare as follows:

2 1. I am a partner of Peiffer Wolf Care Kane Conway & Wise, an attorney licensed in  
3 the States of Michigan and Illinois and duly admitted to practice before this Court, representing  
4 Plaintiffs in the above caption action.

5 2. I submit this declaration in support of Plaintiffs' List of Disputed Entries for  
6 Special Master Review on March 20, 2025.

7 3. Plaintiffs incorporate the Discovery Letter Brief Regarding Disputed Entries for  
8 Special Master Review filed by All Plaintiffs on March 4, 2025. *See* ECF No. 2434. Plaintiffs  
9 incorporate the brief to support the specific reasons each entry on the List of Disputed Entries  
10 was challenged. The Brief included the general background of the privilege dispute process to  
11 date, the legal standard for Plaintiffs raising challenges to Defendants' privilege log entries, and a  
12 general argument for the challenges Plaintiffs raised.

13 4. The List of Disputed Entries for Special Master Review Plaintiffs provided on  
14 March 20, 2025 contained entries still in dispute for custodian, Valerie Shuping.

15 5. The List of Disputed Entries for Special Master Review Plaintiffs provided on  
16 March 20, 2025 did not contain any entries for the custodians that overlapped with custodians  
17 already submitted to the Special Master for review.

18 **Valerie Shuping**

19 6. Defendants included approximately 1,985 entries for Valerie Shuping across its  
20 Tranche 1, Tranche 2, Tranche 3, and Tranche 4 privilege logs.

21 7. Plaintiffs originally challenged approximately 900 of these 1,985 entries.

22 8. As of January 31, 2025<sup>1</sup>, Defendants withdrew their claim of privilege to 200  
23 entries in full and 116 entries in part.

24 9. On March 10, 2025, Defendants provided Plaintiffs with a revised privilege log  
25 after Defendants re-reviewed all entries in dispute. Defendants withdrew their claim of privilege  
26 to 547 entries in full and 263 entries in part.

27 \_\_\_\_\_  
28 <sup>1</sup> Defendants provided Plaintiffs a revised privilege log on January 31, 2025. This was the last revised privilege log  
Defendants provided before they started providing revised privilege logs in accordance with the Master Order No. 2.  
*See* ECF No. 2357.

1           10. Defendants provided Plaintiffs with another revised Privilege Log on March 19,  
2 2025. In total, to date, Defendants have withdrawn their claim of privilege to 561 entries in full  
3 and 268 entries in part.

4           11. On March 14, 2025, Plaintiffs provided the Special Master and Defendants with a  
5 lists of 32 entries still in dispute for Valerie Shuping following a review of Uber's revised  
6 privilege log that included updated or additional information provided by Uber, documents  
7 produced with redactions, or lessons learned from Judge Cisneros' privilege orders. Plaintiffs  
8 also provided a list of entries in dispute from Uber's post January 10, 2025 privilege logs for  
9 Valerie Shuping.

10           12. The parties met and conferred on March 14, 2025 and, after the conferral,  
11 Defendants withdrew their claim to an additional 3 entries and will produce an additional entry  
12 with redactions.

13           13. On March 19, 2025, Defendants provided a revised privilege log, this log noted an  
14 additional 9 entries that Defendants withdrew their privilege claim.

15           14. On March 20, 2025 and March 21, 2025 Plaintiffs provided the Special Master  
16 and Defendants with a list of 26 entries that remain in dispute for Valerie Shuping.

17           15. On March 21, 2025, Defendants informed Plaintiffs of an additional entry they are  
18 withdrawing their privilege claim and one entry to be produced with redactions.

19           16. On March 24, 2025, Plaintiffs provided the Special Master and Defendants with a  
20 list of 24 entries that remain in dispute for Valerie Shuping

21           17. Defendants did not provide a redacted version of entry  
22 JCCP\_MDL\_PRIVLOG069773 in time for Plaintiffs to review.

23  
24 Executed this 24th day of March, 2025 in Detroit, Michigan.

25  
26 /s/ Tiffany R. Ellis  
27 Tiffany R. Ellis  
28